CALIFORNIA Acupuncture Board



STRATEGIC PLAN

Adopted by the Board June 25, 2002



CALIFORNIA ACUPUNCTURE BOARD

Strategic Plan June 25, 2002

Table of Contents

Executive Summary – Background and Description of the Board and Profession • History of the Board	
• Function of the Board	.4
Board Composition	.4
Committees of the Board	4
Board Regulation of the Practice and Practitioner	.5
Board Accomplishments – 1998 through 2001	. 6
Mission Statement.	. 8
Vision Statement	. 8
Principles	8
Strategic Goals • Strategic Issue No. 1 – Education Program	
Strategic Issue No. 2 – School Approval Process	
• Strategic Issue No. 3 – Enforcement Program	. 14
Strategic Issue No. 4 – Examination Program	. 17

ACUPUNCTURE BOARD

Executive Summary -Background and Description of the Board and Profession

History of the Board

The Board of Medical Examiners (now called the Medical Board of California) began regulating acupuncture in 1972 under provisions that authorized the practice of acupuncture under the supervision of a licensed physician as part of acupuncture research in medical schools. Subsequently, the law was amended to allow acupuncture research to be conducted under the auspices of medical schools rather than just in medical schools.

In 1975, Senate Bill 86 (Chapter 267, Statutes of 1975) created the Acupuncture Advisory Committee (committee) under the Board of Medical Examiners and allowed the practice of acupuncture but only upon prior diagnosis or referral by a licensed physician, chiropractor or dentist. In 1976 California became the eighth state to license acupuncturists. Subsequent legislation in 1978 established acupuncture as a "primary health care profession" by eliminating the requirement for prior diagnosis or referral by a licensed physician, chiropractor or dentist; and Assembly Bill 2424 (Chapter 1398, Statutes of 1978) authorized Medi-Cal payments for acupuncture treatment.

In 1980 the law was amended to: abolish the Acupuncture Advisory Committee and replace it with the Acupuncture Examining Committee within the Division of Allied Health Professions with limited autonomous authority; expanded the acupuncturists' scope of practice to include electroacupuncture, cupping, and moxibustion; clarified that Oriental massage, exercise and herbs for nutrition were within the acupuncturist's authorized scope of practice; and provided that fees be deposited in the Acupuncture Examining Committee Fund instead of the Medical Board's fund. Most of these statutory changes became effective on January 1, 1982.

In 1982, the Legislature designated the Acupuncture Examining Committee as an autonomous body, and effective January 1, 1990, through AB 2367 (Chapter 1249, Statutes of 1989) the name was changed to the Acupuncture Committee to better identify it as a state licensing entity for acupuncturists. On January 1, 1999, the committee's name was changed to the Acupuncture Board (SB 1980, Chapter 991, Statutes of 1998) and removed the Committee from within the jurisdiction of the Medical Board of California (SB 1981, Chapter 736, Statutes of 1998).

Function of the Board

The Acupuncture Board's (Board) legal mandate is to regulate the practice of acupuncture in the State of California. The Board established and maintains entry standards of qualification and conduct within the acupuncture profession, primarily through its authority to license. The Acupuncture Licensure Act commences with Business and Professions (B&P) Code, Section 4925 et seq. The Board's regulations appear in Title 16, Division 13.7, of the California Code of Regulations (CCR).

The primary responsibility of the Acupuncture Board is to protect California consumers from incompetent, and/or fraudulent practice through the enforcement of the Acupuncture Licensure Act and the Board's regulations. The Board promotes safe practice through the improvement of educational training standards, continuing education, enforcement of the B&P Code, and public outreach.

Board Composition

SB 1980 (Chapter 991, Statutes 1998) reduced the Board from 11 members to 9 members, consisting of four members who are licensed acupuncturists with at least five years of acupuncture experience and not licensed as physicians, one member who is a licensed physician with two years of acupuncture experience, and four public members. The member serves a four-year term for a maximum of two terms. The Governor appoints the four licensed members, physician member, and two public members. The Senate Rules Committee and the Speaker of the Assembly each appoint one public member. The Board is currently has seven appointed members and two professional vacancies.

Committees of the Board

The Acupuncture Board has four committees that make recommendations to the full Board as follows:

<u>Executive Committee</u> – address issues related to expenditures/revenue/fund condition, executive officer selection/evaluation, legislation/regulations, committee policy/procedures, and special administrative projects.

<u>Education Committee</u> – address issues related to acupuncture educational standards, school application and approval process, tutorial programs, and continuing education.

<u>Examination Committee</u> -- address issues related to development and administration contracts, administration, and miscellaneous issues.

<u>Enforcement Committee</u> – address issues related to scope of practice, complaints, disciplinary decisions, probation monitoring, reinstatements, and miscellaneous issues.

Board regulation of the practice and practitioners

The Acupuncture Licensure Act (B&P Code, Section 4925-4979) and its related administrative regulations (Title 16, CCR, Sections 1399.400 et seq.) defines and regulates both the practice of acupuncture and the profession. The Board licenses and regulates acupuncturists, establishes educational standards and approves acupuncture training programs, of which 30 educational institutions have been approved by the Board to date. Currently a Masters Degree is required for graduation and a 4,000-hour Doctorate program was nationally adopted May 2000. As part of its licensing function, biannually, the Board develops and administers the California Acupuncture Licensing Examination (CALE) in English, Chinese and Korean.

The practice of acupuncture, as defined in B&P Code Section 4927, involves the stimulation of certain points on or near the surface of the body by the insertion of needles to prevent or modify the perception of pain or to normalize physiological functions, including pain control, for the treatment of certain diseases or dysfunctions of the body. Licensed acupuncturists in California are primary health care professionals holding the highest responsibilities of providing for the health and safety of their patients. Any incident or behavior compromising that safety is critical. An acupuncturist may diagnose and treat illnesses and injuries, in addition to prescribing herbs and herbal formulas, perform Oriental massage, electroacupuncture and moxibustion. The Board regulates over 8,000 licensed acupuncturists.

In California, only those persons who have met the educational and examination requirements and have been issued and possesses a current and valid acupuncturists license are allowed to practice acupuncture. Individuals licensed by the Acupuncture Board use the title of Licensed Acupuncturist (L.Ac.) or Certified Acupuncturist (C.A.).

Exemptions: Physicians licensed by the Medical Board of California are authorized to practice acupuncture within their scope of licensed medical practice. Podiatrists licensed by the California Board of Podiatric Medicine and dentists licensed by the Dental Board of California may also practice acupuncture as part of their respective licensed practices - if they have completed a course of instruction in acupuncture approved by their respective licensing boards (B & P Code Section 4947).

The ethnic diversity of the profession often brings about language barriers and accepted practices, which vary between the different ethnicities. Eastern and Western medicine, while distinctly separate entities, continue to integrate and it has been a challenge to the Board to educate the profession about acceptable standards of ethics for practice in the West, as well as advancing the esteem and acceptance of the profession while maintaining the historical integrity of the various Eastern disciplines. The accelerating "mainstreaming" of alternative medicines, particularly acupuncture and Oriental medicine has added to the Boards workload responsibilities and challenges. Acupuncture is used extensively in pain management; drug and alcohol detoxification, treatment of HIV patients and cancer patients to mitigate the impact of chemotherapy. The majority of enforcement cases, which are on the rise, are cases relating to unprofessional conduct,

ethical issues, practice management issues and sexual misconduct. The Board has been challenged as to how to get the message to the public of what to expect from the acupuncturists, in addition to informing licensees regarding what constitutes proper practice protocol. The Board wrote, designed, produced and released the first consumer brochure on acupuncture and Oriental medicine in 2001/2002 Fiscal Year.

Board's Accomplishments - 1998 through 2001 1998

- Proceeded through the sunset review process with the Joint Legislative Sunset Review Committee and was sunrisen until January 1, 2004.
- Secured the Acupuncture Board's autonomy from the Medical Board of California and name change from Committee to Board.
- Through regulations, removed the limitation on hours accredited towards ethics and practice management for continuing education and allow continuing education credits to be awarded on Board approved distance education courses.
- Implemented enforcement Cite and Fine policies and procedures.
- Implemented audit procedures and conducted audits of licensees to ensure compliance with licensure requirements.
- Created a Law Enforcement Task Force to promote cooperation between enforcement agencies and to improve service to the public.
- Through the budget change proposal (BCP) process, secured funding to adequately support the enforcement and examination programs and to develop a consumer brochure.
- Commenced development and design of Board's website.

1999

- Clinical portion of the licensing examination eliminated, developed a new written examination plan to incorporate the knowledge, skills, and abilities from the clinical into a written format and trained a new examination contractor.
- Implemented live-scan fingerprinting for applicants, reducing the waiting period for obtaining a license by approximately 70%.
- Implemented Board's website.
- Expanded the website to offer license verification capability for licensee name, address and disciplinary status. (Board averages about 4,500-license lookup hits a month).
- Legislative and regulatory amendments completed on the examination and reexamination fee structure to be actual cost to the Board for the development, grading and administering of each examination.
- Evaluated, tested and replaced or modified technical systems to be Y2K ready.
- Promoted and reclassified existing staff, hired new staff, and trained staff in each position.
- Reviewed, site visited, and approved a new acupuncture educational institution.
- Secured Language Line with AT&T to accommodate non-English speaking calls to the Board.
- Developed and implemented the Board's Business Continuity Plan.
- Secured authority to hire a permanent enforcement/education office technician.

• Commenced special task force meetings to define competencies and educational outcomes in order to increase educational curriculum requirements for licensure.

2000

- Commenced occupational analysis.
- Five new member appointments made to the Board.
- Secured authority to hire a permanent examination office technician.
- Revised audit procedures and expanded number of licensees audits to ensure compliance with licensure requirements.
- Wrote distributed and implemented school site visit guidelines and manual for site visit team.
- Commenced development and design of a new consumer brochure.
- Reviewed, site visited, and approved a new acupuncture educational institution.
- Commenced regulatory process for three new regulatory changes (i.e., (1) increase curriculum program requirements to 3,200-hours; (2) use of the title "Doctor"; and (3) amending licensing exam administration and results.)
- The Department of Finance Office of State Audits and Evaluations conducted a successful review audit of the Board's internal controls.

2001

- Concluded occupational analysis.
- Two new member appointments made to the Board.
- Completed and mailed consumer brochure.
- The Board's website was redesigned, information expanded, and connected to the Governor's new portal.
- Reviewed, site visited, and approved five new acupuncture educational institutions
- The Department of Consumer Affairs Internal Audit Office conducted a successful performance audit of the Board's programs.
- Commenced writing and developing of licensee newsletter.
- Established the Competencies and Outcomes Task Force to identify practice competence and assign educational hours to those competencies.
- Commenced the second sunset review process/hearings, and the Board is due to be sunrisen.

This plan will be reviewed by the Board on an annual basis and revised as needed. If you have questions regarding the plan, contact Marilyn Nielsen, Executive Officer, at 263-2680. If you would like copies of the plan, copies can be accessed on the Board's website at www.acupuncture.ca.gov or by contacting Janelle Wedge at 263-2680, extension 205.

MISSION

The Mission of the Acupuncture Board is:

• To benefit and protect the public through appropriate regulation of licensure, education standards, and enforcement of the Acupuncture Licensure Act.

VISION

The Acupuncture Board is committed to the enhancement of the health and safety of the people of California by ensuring:

- Highly qualified practitioners working as primary health care professionals in partnership with other health care providers
- Fair and ethical standards of professional conduct
- Excellence in practitioner training and education

PRINCIPLES

The Board values the following:

- Meeting the needs of the public that we serve with integrity.
- Striving to provide a quality service to the public and profession.
- Appreciation for the members and staff of the Board.

STRATEGIC GOALS

The Board has established four strategic goals that provide the framework for furthering its mission.

EDUCATION PROGRAM

To improve education to be commensurate with the professions status as primary health care professionals. Update current curriculum to ensure the students are receiving the appropriate training for practice. Ensure curriculum requirements are reflective of the 2001 Occupational Analysis. Reevaluate student qualifications or requirements for entry into acupuncture educational institutions. Ensure that all applicants are minimally qualified to treat patients in a healthy and safe manner.

SCHOOL APPROVAL

Update and streamline school approval process. Ensure the application process is fair and effective and that the educational institution provides the Board with complete and accurate information on the institution. Ensure the Board's laws and regulations are current to establish an acceptable standard for institutional approval. Ensure the site visit guidelines and manual is reflective of the standard established by the Board. Ensure site visit team members are adequately trained and provided the tools necessary to perform a thorough and complete site visit. Research options for school approval process.

ENFORCEMENT PROGRAM

To better protect the consumer through increased enforcement of the Acupuncture Licensure Act. Ensure that negligent, incompetent and unlicensed practice of acupuncture is addressed through proactive, timely and consistent enforcement of the Acupuncture Licensure Act and Board regulations. Ensure the Licensure Act and regulations are current and up-to-date in defining causes for discipline and the practice of acupuncture and Oriental medicine.

EXAMINATION PROGRAM

Ensure a fair and valid examination that is a reliable measure of competence. Ensure that those entering the acupuncture and Oriental medicine profession possess minimal competency to practice independently and safely. Ensure examination applicants possess at least the minimum educational requirement, which is currently a Masters Degree. Continue focused oversight of the contractors who develop and administer the licensing examination. Incorporate the latest technology in administering examinations and utilize examination development and validation methods.

EDUCATION PROGRAM

Strategic Issue No. 1

GOAL

To improve education to be commensurate with our status as primary health care professionals.

Board Committee Responsibility: Education Committee

Strategic Objectives

- 1.1 Update the current curriculum to ensure that students are receiving the appropriate training for practice (Target Date: 6/30/03)
 - Accept/reject/modify Competencies Task Force recommendations (Target Date: 9/30/02)
 - Update curriculum in response to 2001 Occupational Analysis (Target Date: 9/30/02)
 - Evaluate Tutorial program (Target Date: 12/31/02)
 - Review tutorial examination statistics
 - Review the number of trainees to have completed an approved program
 - Survey completed tutorial trainees regarding satisfaction of program
 - Reevaluate qualifications (prerequisites, age, education, etc.) (B&P 4938, CCR 1399.436) (Target Date: 6/30/03)
- 1.2 Ensure clinical competency
 - Review Competencies Task Force recommendations (Target Date: 6/30/02)
 - Look at other models (internships, mentorships, etc.) (Target Date: 6/30/03)
- 1.3 Ensure quality and appropriate continuing education (Target Date: 6/30/03)
 - Evaluate and monitor courses and providers (Target Date: 6/30/03)
 - Staff establish plan and timelines to research and present evaluation and findings to Board members (Target Date: 12/31/02)
 - Distribute appropriate "Notice of Warning" to all continuing education providers (Target Date: 9/30/02)
 - Develop log or tracking document for submitted course attendance records (Target Date: 12/30/02)
 - Completely implement revised auditing process for continuing education courses (Target Date: 9/30/02)
 - Issue Cite and Fine for non-compliance
 - Consider other models of course/provider approval

Ongoing Objectives

- Continue oversight of Board approved acupuncture educational institutions.
- Ensure quality review and evaluation of continuing education courses for relevancy.
- Assure competency of licensees through mandatory continuing education requirements.
- Educate other stakeholders and the consumer about educational requirements for the profession.
- Continue to improve educational standards through increasing curriculum requirements and school approval standards.
- Evaluate guidelines and approval process for continuing education courses and providers.
- Update continuing education regulations as needed.
- Continue streamlining continuing education auditing process.
- Maintain rapport with national accrediting agency.
- Outreach to the schools and students regarding legislative and regulatory changes that effect them.
- Maintain a high standard for tutorial approvals.

Performance Indicators

- 1. Student satisfaction surveys
- 2. Statistics by schools on exam pass/fail rates
- 3. Examination pass/fail statistics on tutorial students
- 4. Schools Annual Report compliance
- 5. Number of course or provider applications received, approved and/or denied
- 6. Number and type of complaints filed by providers and participants
- 7. Number of citations and fines issued for non-compliance issues
- 8. Number and nature of complaints and cases filed regarding practice
- 9. Number of telephone calls and emails to the Board for comments about schools and/or education
- 10. Website hits

Resource Assumptions

A majority of the workload associated with these objectives is not absorbable within existing resources.

SCHOOL APPROVAL PROCESS

Strategic Issue No. 2

GOAL

Update and streamline school approval process.

Board Committee Responsibility: Education Committee

Strategic Objectives

- 2.1 Update school approval laws and regulations to ensure students are receiving excellent training (Target Date: 12/31/03)
 - Review laws and regulations to set criteria for school approval (Target Date: 6/30/03)
 - Research options for school approval process (Target Date: 12/31/02)
 - Evaluate site visit process (including considering expanding pool of practitioners to assist in the performance of site visits) (Target Date: 6/30/03)
 - Evaluate the role of accreditation (Target Date: 12/31/02)
- 2.2 Develop an ongoing review (i.e., re-review) process for continuing approval of schools (Target Date: 6/30/03)
- 2.3 Evaluate the role of accreditation agency to conduct reviews (Target Date: 12/31/02)

Ongoing Objectives

- Continue review of the national accrediting agency.
- Continue oversight of Board approved acupuncture educational institutions
- Enhance training of site visit team members.
- Continue to evaluate and update school approval standards defined in the site visit manual.
- Continue joint site visits with BPPVE whenever possible.
- Continue attending biannual national accrediting meetings.
- Increase compliance for the approved schools to file the required annual report.
- Review and amend laws and regulations as needed to maintain quality oversight.
- Maintain rapport with Board approved educational institutions.
- Schedule random visits to Board approved educational institutions.
- Provide timely and quality responses on information requests.
- Update procedures manual as necessary.
- Ensure guest acupuncturists are in compliance with INS laws and requirements.

Performance Indicators

- 1. Student and alumni satisfaction surveys
- 2. School statistics on examination pass/fail results
- 3. Number and type of complaints received on a school
- 4. Number of telephone calls and emails to the Board for comments about schools
- 5. Schools compliance with filing annual reports
- 6. Number of applications for school approval received
- 7. Number and quality of school externship sites filed
- 8. Website hits

Resource Assumptions

The majority of the workload associated with these objectives is absorbable within existing resources.

ENFORCEMENT PROGRAM

Strategic Issue No. 3

GOAL

To better protect the consumer through increased enforcement of the Acupuncture Licensure Act

Board Committee Responsibility: Enforcement Committee

Strategic Objectives

Develop a proactive enforcement plan to identify activities and use of resources for the following:

- 3.1 Update complaint disclosure policy (Target Date: 12/31/02)
 - Evaluate DCA's revised standard policy
 - Solicit input from the profession on DCA's revised standard policy
 - Evaluate policies of other professions, boards, etc.
- 3.2 Education of practitioners (Targeted Date: 6/30/03)
 - Revise and continue distribution of Consumer Brochure to licensees
 - Develop and distribute licensee newsletter biannually
 - Revise and expand website
 - Hold mini workshops with acupuncture schools and students
- 3.3 Education of public (Target Date: 6/30/03)
 - Distribute Consumer Brochures
 - Research televised and audio public service announcements, 3 languages
 - Expand on press releases
 - Expand and update website
 - Continue participation in consumer assistance fairs
- 3.4 Develop relationship with local law enforcement (Target Date: 12/31/02)
 - Hold Enforcement Task Force meeting in Northern California
 - Evaluate incorporating Disciplinary Guidelines into regulation
- 3.5 Partnership with professional associations (Target Date: 6/30/03)
 - Staff an information booth at professional association conferences/seminars
 - Provide open dialogue with licensees and students
 - Provide information on laws, regulations, scope issues, etc.
- 3.6 Look at the roles of schools (Target Date: 6/30/03)
 - Encourage expanded instruction in professional responsibilities, ethics and practice management
 - Research schools or board developing and administering a jurisprudence exam
 - Evaluate need for a jurisprudence exam as a condition of graduation
- 3.7 Continuing education (Target Date: 12/30/03)
 - Evaluate need to have a jurisprudence exam become a condition of renewal every four to six years
- 3.8 Scope of Practice (Target Date: 12/31/03)

- Revise existing scope of practice Legal Opinion 93-11
- Adopt existing CAOMA Scope of Practice into laws and regulations (instead of a reference document)
- Await outcome of SB 1951

Ongoing Objectives

- Continue commitment to maintain a proactive enforcement program.
- Continue distribution of Consumer Brochure to licensees.
- Ensure ongoing dialog and continue building rapport with local law enforcement.
- Enhance and expand licensing and enforcement information available on the Board's website, including license lookup.
- Educate consumers through prompt and relevant press releases and public announcements.
- Educate students and profession on the primary purpose of the Board.
- Develop and monitor statistics on all enforcement activities.
- Increase Board participation in consumer assistance fairs.
- Implement Board participation at professional association conferences and symposiums.
- Update Disciplinary Guidelines regularly.
- Continue to respond and resolve complaints in a timely and efficient manner.
- Continue and expand usage of Cite and Fine program.
- Continue to expand the pool of expert consultants/witnesses the Board utilizes for the enforcement program.
- Outreach to the approved educational institutions and acupuncture students regarding scope of practice and standards of care issues.
- Ensure probationers are in compliance with decision terms and conditions.
- Training staff on revisions of state and federal legislative, regulatory, and legal mandates that affect enforcement codes.
- Publish newsletter on an annual basis.
- Expand links to related and relevant media articles.

Performance Indicators

- 1. Number of website hits and phone calls by public
- 2. Results of complainant's satisfaction surveys
- 3. Number and nature of complaints filed, investigations opened, accusations filed, decisions rendered and citations issued
- 4. Number of telephone calls and emails to the Board regarding practice issues
- 5. Number of repeat actions for disciplined licensees
- 6. Number of calls from law enforcement based on website
- 7. Increased compliance with filing requirements

Resource Assumptions

The complaint workload continues to increase. The Board's website has been expanded to include more information about the complaint process and procedures to file a complaint, in addition to providing the public with the ability to look up licensee data and status, including disciplinary action against the licensee. The Board has developed and distributed its first consumer brochure, which will also define the Board's complaint process. In addition, the Board has continued an aggressive outreach effort to law enforcement statewide and created a Law Enforcement Task Force to promote cooperation between enforcement agencies and improve service to the public. With the rising popularity of acupuncture and Oriental medicine as a complement or alternative to allopathic medicine in California, and the increase in the public awareness of the Boards' enforcement and complaint process, it has contributed to the increase of complaints received and processed. The Board's existing budget appropriation is not at a level that accommodates the enforcement activities related to this increased workload. The Board has exceeded the allocated budget for the Attorney General costs for the last two fiscal years and cases have been held for the last quarter of the fiscal year to maintain fiscal stability. Existing resources cannot support an aggressive and proactive enforcement process.

EXAMINATION PROGRAM

Strategic Issue No. 4

GOAL

Ensure a fair and valid examination that is a reliable measure of competence

Board Committee Responsibility: Examination Committee

Strategic Objectives

- 4.1 Evaluate the validity and appropriateness of the current test form (Targeted Date: 6/30/03)
 - Assure the number of test questions adequately test the knowledge, skills and abilities (KSAs) to become licensed in California.
 - Improve testing of clinical skills.

Ongoing Objectives

- Continue to provide appropriate oversight of the contractors who develop and administer the licensing examination.
- Continue to improve and standardize the exam translation process.
- Ensure adequate training and oversight of Subject Matter Experts (SMEs) who are developing examination questions.
- Continue to evaluate the feasibility of providing computerized exam administration.
- Ensure the validity of the licensing examination is at its highest level.
- Ensure accurate and quality translated forms of the exam.
- Enhance public awareness of education, licensing and examination requirements of an acupuncturist.
- Conduct legally defensible licensing examinations to test for minimum entry level competency.
- Continue to administer successful examinations that test the competency of candidates' knowledge, skills and abilities in acupuncture and Oriental medicine.
- Outreach and educate acupuncture schools and students on the purpose of the occupational analysis, exam development and administrative process, and application process.
- Develop and expand the pool of qualified subject matter experts who participate in developing the licensing exam.
- Maintain security standards and policies of exam materials.
- Provide extensive and quality training to proctors and expert examiners.
- Continue to accurately evaluate and timely process exam applications.
- Continue to meet all statutory, regulatory and policy deadlines in processing exam application and required documents.
- Ensure examination fees cover the costs of developing, administering, grading and securing the examination.
- Ensure the examination plan is balanced to the current occupational analysis.

Performance Indicators

- 1. Pass/fail results
- 2. Compliance with required processing deadlines
- 3. Candidate Comment Forms and feedback
- 4. Enforcement of security standards
- 5. Efficiency in exam scheduling and issuance of license
- 6. Website hits

Resource Assumptions

The focus and work to maintain a quality examination, while continuing to improve the development and administration processes, has been a priority to the Board. Commencing Fiscal Year 1999/2000 funds were secured to cover developmental and administrative costs. The number of approved applications for the July 17, 2002 exam exceeds 660. This number has continued to increase with each exam administration. The increase in exam applicants will continue, considering the continual increase in school enrollment over the last few years. The work impact to review, process and accommodate the increased number of applicants will need to be addressed in future fiscal years. Also, the Board is researching other methods of exam administration, such as computer based testing, in addition to researching more advanced technology in order to replicate and test for components from the old hands-on clinical exam. A majority of the workload associated with these objections is not absorbable within existing resources.